

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JOFFREY NAULA, individually and on behalf  
of others similarly situated,

Plaintiff,

vs.

MADISON MARKET, LLC, D/B/A  
MADISON MARKET), and ROCCO LOSSA,

Defendants.

Civil Action No. 2:20-CV-10093-KSH-CLW

**DEFENDANTS' OFFER OF  
JUDGMENT TO PLAINTIFF  
PURSUANT TO F.R.C.P. 68**

**PLEASE TAKE NOTICE**, that pursuant to Federal Rule of Civil Procedure 68(a), Defendant Madison Market, LLC, alone and not in conjunction with Defendant Rocco Iossa (improperly plead as "Rocco Lossa"), presents to the Plaintiff Joffrey Naula an Offer of Judgment in the sum of \$4,000, representing any and all wages due, plus attorneys' fees and Court costs accrued to date.

This Offer shall remain open for fourteen (14) days per the subject Rule and if not accepted shall be deemed unaccepted and withdrawn.

In the event of an Unaccepted Offer the Defendant, Madison Market, LLC, reserves the right, pursuant to the subsection (d), to seek costs incurred after this offer was made.

CHIESA SHAHINIAN & GIANTOMASI PC  
*Attorneys for Defendants MADISON  
MARKET, LLC*

/s/Catherine P. Wells

By \_\_\_\_\_  
CATHERINE P. WELLS

Dated: November 11, 2020

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**CERTIFICATION OF SERVICE**

On November 11, 2020, I electronically filed with the United States Court for the District of New Jersey a copy of Defendants' Offer of Judgment to Plaintiff Pursuant to Rule 68. All parties on the Court's electronic service list in this case were served with the above document on November 11, 2020, through the Court's PACER notice of electronic filing system.

I certify that the foregoing statement by me is true to the best of my knowledge and understand that if any statement by me is deemed willfully false, I may be subject to punishment.

Dated: November 11, 2020

*/s/ Catherine P. Wells*

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Catherine P. Wells, Esq.